

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



December 5, 2006

NAVFAC Atlantic
Attn: Daniel R Hood
Code: OPCEV
NC/Caribbean IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Comments on Operable Unit 2, Site 82 Draft Pilot Study Work Plan (PSWP)
Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Draft Pilot Study Work Plan for Operable Unit #2, Site 82, dated October 2006, Received by the NC Superfund Section on November 2, 2006 for the Camp Lejeune, MCB Superfund Site. The following comments are included for the Partnering Teams consideration. The Aquifer Protection Section of the Wilmington Regional office has no comments on this document.

Specific Comments

1. The First Paragraph on page ES-2 states that “. . . the pilot study at Site 82 will address groundwater from baseline to six months following injection . . .” As you know, the emulsified oil will not be depleted in 6 months. Therefore, the conclusions drawn at the end of 6 months must take this fact into consideration. We should schedule a post pilot study monitoring event approximately **one year** after the injections to confirm the final results of the substrate dechlorination of the VOCs. This would also confirm that we do not get significant rebound after the substrate is used up.
2. Section 4.4 on page 4-3 discusses deactivation of 6-DRW01 and that it will be reinstalled and returned to service, if pump and treat is determined to be the appropriate long term remedy. If Enhance Reductive Dechlorination (ERD) is determined to be the most effective remedy we should initiate the remedy as soon as possible after the pilot study is completed in order to minimized further downgradient movement of high concentrations of VOCs in the area of 6-DRW01 that are not impacted by the pilot study injections. If needed we can do the full-scale ERD

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Mr. Daniel Hood

12-05-2006


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injections in phases as we gradually shut down the existing pump and treat system. Depending on the area impacted by the pilot study we may need to reinstall 6-DRW01 if the full scale ERD injections are going to be delayed for a considerable amount of time.

3. Underground Injection Control (UIC) comments will be provided at a later date. However, do not delay the project due to UIC comments. ERD projects using oils and lactates have been completed numerous times in North Carolina (HRC at Site 78). It is not likely that UIC will have any concerns about this injection event. This is especially true since we have an active pump and treat system around the pilot study area.

If you have any questions or comments, please contact me, at (919) 508 8467 or email randy.mcelveen@ncmail.net

Sincerely,

A handwritten signature in black ink, appearing to read "Randy McElveen", with a stylized flourish at the end.

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section
Bob Lowder, EMD/IR
Gena Townsend, USEPA